

**Exhibit Y**

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK  
-----  
MARIANNE ANNISZKIEWICZ,  
  
Plaintiff,  
  
Index No. 20-cv-6629  
(FPG) (MWP)  
  
v.  
  
THE CITY OF ROCHESTER, a municipal entity,  
POLICE OFFICER BRIAN CALA,  
SERGEANT JENNIFER TRENTON,  
  
Defendants.  
-----

Video-recorded Deposition Upon Oral Examination of:  
  
Sergeant Jennifer Trenton

Location: Powers Building  
16 West Main Street, 8th Floor  
Rochester, New York 14614

Date: November 7, 2022

Time: 10:00 a.m.

Reported By: MICHELLE MUNDT ROCHA  
  
Alliance Court Reporting, Inc.  
  
109 South Union Street, Suite 400  
  
Rochester, New York 14607



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:09 2 Jennifer Trenton. Also present in the room for this  
10:09 3 deposition are Plaintiff's attorney, Elliot Shields --  
10:09 4 Defendant's attorney, Peachie Jones; and the court  
10:09 5 stenographer, Michelle Rocha.

10:10 6 SERGEANT JENNIFER TRENTON,

7 called herein as a witness, first being sworn,  
8 testified as follows:

10:10 9 EXAMINATION BY MR. SHIELDS:

10:10 10 Q. Good morning, Sergeant.

10:10 11 A. Good morning.

10:10 12 Q. My name is Elliot Shields. I represent a  
10:10 13 woman whose dog was shot and killed, and I'm going to  
10:10 14 ask you some questions today.

10:10 15 A. Okay.

10:10 16 Q. First let me just go over some ground  
10:10 17 rules for the deposition.

10:10 18 Will you tell me if you don't understand  
10:10 19 my question?

10:10 20 A. Yes.

10:10 21 Q. And will you tell me if you find my  
10:10 22 questions to be confusing?

10:10 23 A. Yes.

10:10 24 Q. And will you tell me if I've assumed an  
10:10 25 incorrect fact in a question?



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:12 2 But when you say "in-service," can you  
10:12 3 explain a little more right now about the PowerPoint  
10:12 4 in-service training?

10:12 5 A. Do you want to know what was included in  
10:12 6 it or what was talked about or, like, what in-service  
10:12 7 is in general?

10:12 8 Q. I'm sorry. That was a bad question.

10:12 9 Can you tell me, was that in-service done  
10:13 10 in the morning, or was it, like, an all-day training?

10:13 11 A. It was part of a day. I don't recall if I  
10:13 12 had the morning portion or the afternoon portion. So  
13 it would have been a split day of two different  
10:13 14 topics, so that was one of the topics included in that  
10:13 15 day.

10:13 16 Q. How long did that training last?

10:13 17 A. Approximately three to four hours, I would  
10:13 18 say.

10:13 19 Q. Who sponsored the training?

10:13 20 A. It was through the department, but the  
10:13 21 Humane Society was -- sent an officer who actually  
10:13 22 conducted the in-service.

10:13 23 Q. I believe in your responses to  
10:13 24 interrogatories you stated that you found that  
10:13 25 PowerPoint in your files; is that right?



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10:13 2 A. Yes, there was a PowerPoint that I found.

10:13 3 Q. When you say you found it in your files,  
10:13 4 did you find a hard copy or an electronic copy?

10:13 5 A. I believe I had an electronic copy -- I'm  
10:13 6 sorry -- a hard copy that I had -- I had a binder that  
10:14 7 I had prepared for studying for the sergeant's exam,  
10:14 8 and that was some of the information that I had  
10:14 9 printed out for that.

10:14 10 Q. Okay. So you printed that out from the  
10:14 11 computer somewhere?

10:14 12 A. At one point in time in preparation for  
10:14 13 the exam I did.

10:14 14 Q. Okay. They didn't give you a copy of that  
10:14 15 PowerPoint, then, as a handout at the training?

10:14 16 A. There may have been, but I don't recall  
10:14 17 that.

10:14 18 Q. Okay. Did they give you any other  
10:14 19 handouts at that training?

10:14 20 A. I don't recall any other handouts.

10:14 21 Q. Do you remember when you took that  
10:14 22 training?

10:14 23 A. So that would have been around 2014.

10:14 24 Q. And was that training something that  
10:14 25 everyone in the department had to take?



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:14 2 A. Correct.

10:14 3 Q. Is there any record of you taking that  
10:14 4 training?

10:14 5 A. The professional development section of  
10:15 6 our department. They take attendance for all  
10:15 7 inservices that we attend.

10:15 8 Q. Okay. So PDS should have an attendance  
10:15 9 record for you and everyone else who attended that  
10:15 10 training; correct?

10:15 11 A. Correct.

10:15 12 Q. And does it just list the names of the  
10:15 13 trainings that you took, the dates that you took the  
10:15 14 training? Is that --

10:15 15 A. I don't know what they do after they get  
10:15 16 the attendance records, but basically for any type of  
10:15 17 in-person in-service that we have, there's an  
10:15 18 attendance book.

10:15 19 So it would have had everybody  
10:15 20 alphabetized in that book. You initial it and date it  
21 or sign it and date it, whatever it is for that one.

10:15 22 And like I said, I'm not sure what happens  
10:15 23 with that attendance book, but it's a new attendance  
10:15 24 book for every in-service that you go to. So  
10:15 25 obviously they go somewhere; I just don't know where.



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:15 2 Q. Okay. Can you just tell me everything  
10:16 3 that you remember from that training?

4 A. Mm-hmm.

10:16 5 (There was a discussion off the record.)

10:16 6 A. There were several videos that were from  
10:16 7 other departments that involved officers' interactions  
10:16 8 with dogs. He shared some of his personal experiences  
10:16 9 as a humane officer in regards to his interactions  
10:16 10 with dogs.

10:16 11 There was some pictures, I would say, of  
10:16 12 what a dog may look like when they're possible that  
10:16 13 they could attack, when they're calm or playful or  
10:16 14 different ways that a dog may present themselves  
10:16 15 towards someone other than their owner.

10:16 16 Q. Do you remember why the training was given  
10:16 17 when it was, which to your recollection you said was  
10:16 18 2014?

10:16 19 A. I'm not sure why it was conducted, no.

10:17 20 Q. Do you know if the training had any effect  
10:17 21 within the department in terms of reduction in dog  
10:17 22 shootings?

10:17 23 A. I don't --

10:17 24 MS. JONES: Objection.

10:17 25 But you can answer. Sorry.



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:17 2 A. I don't have that data.

10:17 3 Q. In your personal experience, did it seem  
10:17 4 to you like officers responded differently to  
10:17 5 situations where dogs were present on residential  
10:17 6 properties after the training?

10:17 7 MS. JONES: Objection.

10:17 8 A. I don't have that information.

10:17 9 Q. So your answer is you don't know?

10:17 10 A. Correct. I don't know what any -- I mean,  
10:17 11 we have 400-plus officers on the road. I don't have  
10:17 12 interactions with them during those situations ever.

10:17 13 Q. When you -- did the training help you to  
10:18 14 interact differently or safer in situations where you  
10:18 15 responded to a residence and there was a dog present?

10:18 16 A. Yes. I believe the biggest thing that I  
10:18 17 took out of that was a lot of the still-frame pictures  
10:18 18 of different ways that dogs act towards people.

10:18 19 I mean, there was hackles. I didn't know  
10:18 20 what a dog hackle was prior to that and knowing that  
10:18 21 if it's raised, that that could mean that they could  
10:18 22 be attacking.

10:18 23 So there was definitely a lot of things  
10:18 24 that I did take away from that training.

10:18 25 Q. Did you take anything else away from the



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:18 2 training?

10:18 3 A. I mean, I think all of it was useful. I  
10:18 4 don't necessarily have any other highlights that I  
10:18 5 have out of it. I mean, that was one of the biggest  
10:18 6 things that I still carry with me to this day.

10:18 7 Q. And just to reiterate what you mean when  
10:18 8 you say "one of the biggest things," are you referring  
10:19 9 to what you just referenced in terms of a dog's  
10:19 10 hackles?

10:19 11 A. Hackles and its body positioning towards  
10:19 12 people.

10:19 13 Q. And "its body positioning" meaning  
10:19 14 aggressive body positioning?

10:19 15 A. Aggressive or playful or calm or -- I  
10:19 16 can't remember the other terminology that was used in  
10:19 17 it, but it's also part of the training bulletin that  
10:19 18 we have as well that has those pictures on it.

10:19 19 Q. Other than speaking with Ms. Jones twice,  
10:19 20 did you speak with anybody else in preparation for  
10:19 21 today's deposition?

10:19 22 A. I did not.

10:19 23 Q. Other than the documents you just  
10:19 24 referenced, did you review any other documents in  
10:19 25 preparation for today's deposition?



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:56 2 you've had to make calls after the fact for animal  
10:56 3 control to come to a scene, is that --

10:56 4 A. Correct.

10:56 5 Q. And what kind of situations do you make  
10:56 6 calls to after the fact for animal control to come to  
10:56 7 the scene?

10:56 8 A. So I could be responding to a house for  
10:56 9 any given situation, and maybe I observe a loose dog  
10:56 10 either at that scene or while en route to that scene.

10:56 11 Other situations could be maybe serving a  
10:57 12 search warrant on a house, and prior to going there  
10:57 13 you know that there's going to be animals inside the  
10:57 14 house. We would make sure that Animal Services was on  
10:57 15 scene with us before you make entry into that house.

10:57 16 I mean, we've had other situations where  
10:57 17 maybe we've had a barricaded gunman or a burglary in  
10:57 18 progress where you have a house surrounded, and maybe  
10:57 19 we hear animals inside. And, again, we know we're  
10:57 20 going to make entry into that house, and we would have  
10:57 21 them stand by to assist us with containing the dog  
10:57 22 either while making entry or prior to entry.

10:57 23 Q. How often do you serve search warrants?

10:57 24 A. Again, it's going to vary. Maybe over the  
10:57 25 course of my career -- maybe 10 to 15 times over the



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:58 2 course of my career.

10:58 3 Q. And so regular patrol officers that aren't  
10:58 4 members of the SWAT team would the RPD also execute  
10:58 5 search warrants?

10:58 6 A. Low-level and basically less dangerous  
10:58 7 search warrants I would say.

10:58 8 Q. And what would lead to a search warrant  
10:58 9 being classified as low-level or less dangerous?

10:58 10 A. You don't have that information that  
10:58 11 there's a weapon involved, a gun involved, either  
10:58 12 within the house or with the crime that occurred that  
10:58 13 led you to the search warrant.

10:58 14 Q. Before you serve that search warrant, are  
10:58 15 you required to do some sort of surveillance before  
10:59 16 entering the property?

10:59 17 A. You're basically doing your homework on  
10:59 18 it. You're either -- you have some form of possibly a  
10:59 19 witness or a victim or somebody who has knowledge of  
10:59 20 that house that you're getting that information from.  
10:59 21 It could come from surveillance, or it could come from  
10:59 22 another party that you're getting that information  
10:59 23 from. Maybe layout of the house, children, animals,  
10:59 24 number of adults, that sort of thing, before you go  
10:59 25 into the house.



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

10:59 2 Q. Is it a requirement to try to figure out  
10:59 3 whether or not there's a dog in the property?

10:59 4 A. That's always one of the questions.

10:59 5 Q. What do you do if there is a dog to  
10:59 6 prepare how to handle the dog when executing a search  
10:59 7 warrant?

10:59 8 MS. JONES: Objection.

10:59 9 A. So, again, there would be lots of  
10:59 10 questions once you get that yes answer for a dog. Is  
10:59 11 it normally crated? Is it kept and contained in a  
10:59 12 certain room? How many? The breed? Is it -- how  
11:00 13 friendly is it? All those type of things would come  
11:00 14 into play with that.

11:00 15 And, again, that would be starting Animal  
11:00 16 Services to be there to set up, formulate some type of  
11:00 17 a plan to either go in with you upon entry or somehow  
11:00 18 be able to get the dog contained where they can come  
11:00 19 in and assist you with controlling the dog.

11:00 20 Q. So if you know there's a dog, then you're  
11:00 21 supposed to have Animal Services with you when the  
11:00 22 warrant is executed?

11:00 23 A. Correct.

11:00 24 Q. In addition to animal control being there,  
11:00 25 what types of precautions would RPD require if they



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

11:26 2 A. I did.

11:26 3 Q. Have you ever destroyed any of your  
11:26 4 department-issued notepads?

11:26 5 A. I have not.

11:26 6 Q. And so we're going to call for production  
11:26 7 of your notes. So we'd ask that after this  
11:26 8 deposition, you go and conduct another search.

11:27 9 A. Okay.

11:27 10 (Document request -- Officer Trenton's notes)

11:27 11 MS. JONES: Objection.

11:27 12 MR. SHIELDS: I'll follow up in writing  
11:27 13 about that.

11:27 14 MS. JONES: Objection. She just said  
11:27 15 under sworn testimony that she looked and could not  
11:27 16 find those.

11:27 17 MR. SHIELDS: I'll follow up in writing.  
11:27 18 Thank you, Peachie.

11:27 19 MS. JONES: Okay.

11:27 20 Q. And you said that there's no general rule  
11:27 21 about the method of storage of these notepads after  
11:27 22 they're full, but the rule states that you're not  
11:27 23 allowed to destroy them; right?

11:27 24 A. Yes.

11:27 25 Q. Did you create any other writings related



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12:05 2 Did I read that question and your answer  
12:05 3 accurately?

12:05 4 A. Yes.

12:05 5 Q. And can you tell me what you remember  
12:05 6 about Ms. Anniszkiewicz's yard?

12:05 7 A. So her yard was a corner lot. It was  
12:05 8 completely fenced in with a 4-foot-high chain-link  
12:05 9 fence. There was a lot of trees and bushes and such  
12:05 10 in the yard, so it was -- it was difficult to see  
12:06 11 completely into the yard.

12:06 12 Q. Okay. Do you remember anything else about  
12:06 13 her property?

12:06 14 A. Not anything specifically. If there is  
12:06 15 anything specific that you want me to elaborate on, I  
12:06 16 can try to.

12:06 17 Q. Okay. Before I ask any specifics,  
12:06 18 generally does anything else about the property come  
12:06 19 to mind when you think about this case?

12:06 20 A. It was a two-story house. I could -- from  
12:06 21 where I was standing by the chain link fence, I could  
12:06 22 observe a porch connected to the house. And that was  
12:06 23 pretty much all I had from my line of sight from the  
12:06 24 front of the house on Belknap Street.

12:06 25 Q. And in your answer to number 4, which



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

12:06 2 asked, you know, what you did to determine if there  
12:06 3 were any dogs prior to entering the gate, you said  
12:07 4 that you shook the fence and waited; right?

12:07 5 A. Yes, I did.

12:07 6 Q. Did you do anything else?

12:07 7 A. So the other things that I would have done  
12:07 8 were observations. There was no Beware of Dog or  
12:07 9 anything that indicated -- like a sign on the exterior  
12:07 10 of the fence that would have indicated that there was  
12:07 11 an animal on the property.

12:07 12 Again, just kind of scanning the lawn  
12:07 13 approaching the house, I saw no indications of  
12:07 14 anything else that really stood out that there was a  
12:07 15 dog in the yard, like a toy laying near the entryway  
12:07 16 gate or a water dish or something like that. I saw  
12:07 17 nothing that really alerted me -- alerted to me that  
12:07 18 there was a dog inside.

12:07 19 Q. Did you -- what did you do -- well, let me  
12:07 20 withdraw that question.

12:08 21 Why did you go to the property?

12:08 22 A. The original 911 call was for a neighbor  
12:08 23 trouble in progress. The information that we had at  
12:08 24 that time was that there was a loose dog and the  
12:08 25 neighbor was trying to run it over.



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

12:34 2 make that phone call to do that.

12:34 3 That's something that another admin.  
12:34 4 channel dispatcher would do for you to make those  
12:34 5 calls. It's not something that you would do yourself.

12:35 6 Q. Okay. So let's watch your body-worn  
12:35 7 camera video, and I'll just ask you some questions  
12:35 8 about it. Give me one second to put it onto the  
12:35 9 screen.

12:35 10 So this is the version that was produced  
12:35 11 in FOIL. So this is the very end of Cala's video at  
12:35 12 18 minutes and 58 seconds into the  
12:35 13 41-minute-and-57-second video, and it will switch over  
12:35 14 to your camera in one second.

12:35 15 A. And just to clarify, so then it switches  
12:35 16 to mine back at the start time; correct?

12:35 17 Q. Correct.

12:35 18 A. And then goes through? Okay.

12:35 19 Q. And I'm hitting Play.

12:36 20 Okay. And, Sergeant Trenton, does the  
12:36 21 video depict you walking up and shaking the gate?

12:36 22 A. It does.

12:36 23 Q. And then how long did you wait between  
12:36 24 shaking the gate and opening it?

12:36 25 A. I counted two seconds. I don't...



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

12:36 2 Q. Let's do that again. Okay.

12:36 3 So I rewind the video to 18 minutes and  
12:36 4 59 seconds, which is, again, the end of Cala's  
12:36 5 body-worn camera video, and I'm going to hit Play  
12:36 6 again.

12:36 7 So I'm pausing right at 19 minutes and 2  
12:36 8 seconds.

12:36 9 Do you know if you touched the gate yet?

12:36 10 A. From hearing, no, I don't -- I can't --

12:36 11 Q. So I'm going to hit Play and Pause real  
12:36 12 quick when you start to shake. Okay.

12:37 13 Is it fair to say that at 19 minutes and 4  
12:37 14 seconds into the video you just started to shake the  
12:37 15 gate?

12:37 16 MS. JONES: Objection.

12:37 17 A. I mean, I think there might have been a  
12:37 18 little movement before there, but within the 19:03 to  
12:37 19 19:04 time range, yes.

12:37 20 Q. And I paused it at 19:07 into the video.  
12:37 21 Had you started to open the gate at that point?

12:37 22 A. So from the video it looks like I hit the  
12:37 23 secured latch up at that point.

12:37 24 Q. Okay. So is it fair to say that you shook  
12:37 25 the gate and then you immediately opened the latch to



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12:37 2 start to open the gate?

12:37 3 MS. JONES: Objection.

12:37 4 A. So, again, the latch is making noise as  
12:37 5 well. So as I'm doing that and still visually  
12:37 6 watching and listening and that, I'm lifting the gate,  
12:37 7 which, again, is part of, in my mind, the shaking of  
12:37 8 the fence and a possible noise that could cue a dog  
12:38 9 into somebody entering their property.

12:38 10 Q. Okay. So I'm going to hit Play again real  
12:38 11 quick.

12:38 12 And now we've paused at 19:09, and the  
12:38 13 gate is completely open; right?

12:38 14 A. Not completely. I'd say it's  
12:38 15 three-quarters. If it was completely open, I'd say it  
12:38 16 would be on the other side of Officer Cala.

12:38 17 Q. So is it fair to say that you've opened  
12:38 18 the gate to begin to enter the yard?

12:38 19 A. Yes.

12:38 20 Q. So you started to shake the gate at 19:03,  
12:38 21 19:04 into the video; is that correct?

12:38 22 A. Correct.

12:38 23 Q. And then by six seconds later the gate's  
12:38 24 open, and you're starting to enter the yard?

12:38 25 A. Correct.



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1 SERGEANT JENNIFER TRENTON - BY MR. SHIELDS

12:38 2 Q. Can you tell me where you waited to see if  
12:38 3 anybody responded to you shaking the gate?

12:38 4 A. During those six seconds. That was the  
12:38 5 time frame that I waited.

12:38 6 Q. How far can you travel in six seconds?

12:38 7 MS. JONES: Objection.

12:39 8 A. I have no idea. I'm sorry. I don't know  
12:39 9 if I can give you an accurate feet, yard, meter  
12:39 10 response on that.

12:39 11 Q. Would you say that you shook the gate  
12:39 12 really loudly or something else?

12:39 13 MS. JONES: Objection.

12:39 14 A. I feel like I shook the gate like I would  
12:39 15 on any other time that I've done the same thing.

12:39 16 Q. So we've got the video paused right now at  
12:39 17 19 minutes and 9 seconds into this video which -- let  
12:39 18 me just back up and ask you.

12:39 19 On the bottom right-hand corner of the  
12:39 20 video do you see those numbers there?

12:39 21 A. I do.

12:39 22 Q. And can you just generally tell me what  
12:39 23 those numbers are that start with 00119?

12:39 24 A. So the 00119 would have been the serial  
12:39 25 number to the body-worn camera that I had, and then



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12:39 2 there's an underscore that goes into JT1650, my  
12:39 3 initials followed by my IBM.

12:39 4 The second row is going to give you the  
12:39 5 date. So 2018 -- I don't know if there's a 2 there  
12:40 6 because it's kind of paused blurry. But it's either  
12:40 7 stating 2018, 6 for June, 10 for the day, and then the  
12:40 8 time stamp on the video. So at that point it's 11:41  
12:40 9 and 53 seconds.

12:40 10 Q. Thank you. So you recognize this as the  
12:40 11 body-worn camera that you had on during the day, that  
12:40 12 day?

12:40 13 A. I do.

12:40 14 Q. If you take a look at the fence, is there  
12:40 15 anything that you notice about this fence?

12:40 16 A. The attached -- the attachment onto the  
12:40 17 top of it is not something that you would see normally  
12:40 18 on a fence.

12:40 19 Q. Do you have any idea why that attachment  
12:40 20 was included on the top of that fence?

12:40 21 A. I do not know.

12:40 22 Q. Do you have any estimate for how high that  
12:40 23 attachment is to the top of the fence?

12:40 24 MS. JONES: Objection.

12:40 25 A. So I know that a normal chain-link fence



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12:40 2 is approximately 4 feet high. So I would say the  
12:41 3 fence that we're looking at is 4 feet, and then I  
12:41 4 would estimate from looking at it right now that maybe  
12:41 5 that's another foot or 12 inches on top of that fence.  
12:41 6 So I would say that that may bring it up to 5 feet,  
12:41 7 approximately, in total.

12:41 8 Q. Is that something you thought about before  
12:41 9 you entered the yard?

12:41 10 A. I did not.

12:41 11 Q. As we sit here today, can you think of any  
12:41 12 reasons why there might be an additional foot added to  
12:41 13 the top of that fence?

12:41 14 MS. JONES: Objection.

12:41 15 A. I mean, possibly that they have a child  
12:41 16 that either likes to climb or an animal that likes to  
12:41 17 jump would be my guess at this point in time.

12:41 18 Q. But that's not something that you  
12:41 19 considered before you entered the yard?

12:41 20 A. I didn't even think twice of it, honestly.

12:41 21 Q. All right. I'm going to hit Play again  
12:41 22 now at 19 minutes and 9 seconds into the video.

12:41 23 I'm sorry. Right before that, did you  
12:41 24 hear yourself say that you thought you saw animal  
12:41 25 control?



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12:41 2 A. I did say that.

12:42 3 Q. Does that refresh your recollection at all  
12:42 4 about whether or not you saw animal control on that  
12:42 5 day?

12:42 6 A. Yes. So I would have -- I saw them in the  
12:42 7 general area when we were pulling up. I can't recall  
12:42 8 what street they would have been on, but I did observe  
12:42 9 an animal control vehicle in the area.

12:42 10 Q. Okay. After seeing that animal control  
12:42 11 vehicle in the area, did you reach out to them at all?

12:42 12 A. I did not. At that time I was unaware of  
12:42 13 an animal control job in the system at the same time  
12:42 14 as ours.

12:42 15 Q. Okay. Even though it was a call for a  
12:42 16 stray dog?

12:42 17 MS. JONES: Objection.

12:42 18 MR. SHIELDS: I'll withdraw that question.

12:42 19 Q. Even though it was a call that involved a  
12:42 20 dog and a neighbor dispute?

12:42 21 A. Correct. I did not know that they were  
12:42 22 dispatched as well.

12:42 23 Q. When you saw animal control in the  
12:42 24 neighborhood, did you think that it could have been  
12:42 25 related to the call that you were dispatched for?



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12:42 2 MS. JONES: Objection.

12:42 3 A. I was not sure if it was amongst us, if it  
12:43 4 was a separate job that they were dealing with or if  
12:43 5 they were just proactively doing something at that  
12:43 6 point in time. I had no idea what they were doing.

12:43 7 Q. And you didn't do anything active to  
12:43 8 figure that out?

12:43 9 MS. JONES: Objection.

12:43 10 A. I did not.

12:43 11 Q. I'm going to hit Play again at 19 minutes  
12:43 12 and 12 seconds into this video.

12:43 13 And as we're paused right now at 19  
12:43 14 minutes and 19 seconds into the video, can you just  
12:43 15 kind of describe what you did after entering the gate  
12:43 16 up to this point?

12:43 17 A. So there's the attached porch that goes  
12:43 18 along the house. I went up the first set of stairs.  
12:43 19 Immediately to my left I observed -- I'm going to  
12:43 20 describe it as like an alcove. It's like the house  
12:43 21 set in a little bit to where the door was.

12:44 22 And I began to approach that door to  
12:44 23 attempt to make contact with somebody in the house.

12:44 24 Q. And where we're paused right now, what do  
12:44 25 you see from the angle your body camera video is



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12:44 2 pointing?

12:44 3 A. So past me now I know I see more yard with  
12:44 4 a driveway and at least one vehicle in the driveway  
12:44 5 that I believe from now, from standing there, is  
12:44 6 connected to that house.

12:44 7 Q. All right. I'm going to hit Play -- well,  
12:44 8 before I hit Play again, up to this point, you hadn't  
12:44 9 observed any people or any dogs in the backyard of the  
12:44 10 house; is that right?

12:44 11 A. I have not at this point.

12:44 12 Q. And now 19 minutes and 19 seconds I'm  
12:44 13 going to hit Play again.

12:45 14 Okay. So I'm pausing at 19 minutes and 59  
12:45 15 seconds into the video.

12:45 16 MS. JONES: Just for the record, the time  
12:45 17 stamp on the BWC is 11:42:43. It's just a little more  
12:45 18 helpful.

12:45 19 MR. SHIELDS: Thank you.

12:45 20 Q. And, Sergeant Trenton, at where we're  
12:45 21 paused at 19 minutes and 59 seconds into this video,  
12:45 22 or 11:42:43 on the time stamp, now you're back outside  
12:46 23 of the yard; correct?

12:46 24 A. Correct.

12:46 25 Q. And while you were in the yard, Officer



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12:46 2 Cala shot the dog?

12:46 3 A. It was inside of the yard, yes.

12:46 4 Q. And that was scary; right?

12:46 5 A. It was.

12:46 6 Q. Can you tell me how you felt when Officer  
12:46 7 Cala shot the dog?

12:46 8 A. Do you only want to know my feelings at  
12:46 9 that point, or can I go and let you know my feelings  
12:46 10 prior to having the dog charge past me?

12:46 11 Q. Sure. Why don't we start with when you  
12:46 12 first saw the dog, how did you feel?

12:46 13 A. Okay. So as I'm about to make contact  
12:46 14 onto the door, I'm attempting to knock on the door,  
12:46 15 the dog appears. Large, long-haired, black dog.

12:46 16 I became a little nervous at that point,  
12:47 17 hoping maybe that the dog would stay, but  
12:47 18 unfortunately the dog kept coming. So I -- my first  
12:47 19 instinct was to try to kind of remove myself from --  
12:47 20 to step back.

12:47 21 As I take a step back, the dog appears to  
12:47 22 not either notice me or -- I don't know what the  
12:47 23 thought process was, obviously, and it charges past  
12:47 24 me. So I'm clearly nervous, as you can see, where I  
12:47 25 kind of, like, gasp or something as I move back toward



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12:47 2 the door. And then I'm trying to stay against that  
12:47 3 door to not make movement to try to startle the dog at  
12:47 4 that point.

12:47 5 And as the dog is past me, another dog  
12:47 6 approaches, and I see a gray -- darker gray dog out of  
12:47 7 my line of sight. So then I'm becoming concerned on  
12:47 8 the approach of where that dog's going to go, if he's  
12:47 9 going to come toward me.

12:48 10 And that's when I hear the shot ring out.  
12:48 11 So I'm nervous as to, you know, what happened at that  
12:48 12 point. That shot did scare the other dog, so that dog  
12:48 13 was able to retreat at that point. And then I just  
12:48 14 stayed still to make sure that I wasn't getting in a  
12:48 15 line of fire or something, to protect myself at that  
12:48 16 point before I moved. And I asked if it was --  
12:48 17 basically if it was safe to move at that point.

12:48 18 Q. So the whole situation sounds pretty  
12:48 19 terrifying.

12:48 20 A. It is.

12:48 21 Q. There are two dogs?

12:48 22 A. Correct.

12:48 23 Q. At least that you saw?

12:48 24 A. Correct.

12:48 25 Q. And there's a gunshot?



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12:48 2 A. Correct.

12:48 3 Q. And that was scary?

12:48 4 A. All of it put together was definitely a  
12:48 5 scary situation.

12:48 6 Q. And what could you have done to avoid that  
12:48 7 situation?

12:48 8 MS. JONES: Objection.

12:48 9 A. I mean, more specifically, like, overall?  
12:49 10 I feel like that's a pretty broad question. I don't  
12:49 11 want to answer it out of line here without a little  
12:49 12 bit more.

12:49 13 Q. Overall, what could you have done to avoid  
12:49 14 having put yourself in that terrifying situation?

12:49 15 MS. JONES: Objection.

12:49 16 A. I guess if we want to Monday morning  
12:49 17 quarterback my thought process at that point, possibly  
12:49 18 shaking the fence longer, maybe yelling to announce  
12:49 19 our presence. Other than that, once I'm inside the  
12:49 20 gate, I don't have any -- I'm comfortable with what  
12:49 21 happened once I'm inside of there.

12:49 22 Q. What else could you have done before  
12:49 23 entering the yard?

12:49 24 MS. JONES: Objection.

12:49 25 A. Other than what I just said? I did just



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01:29 2 technically I would have one, but mine would be 811650  
01:29 3 to correspond to my IBM number. Because my IBM number  
01:29 4 is 1650.

01:29 5 Q. Okay. So they just basically changed your  
01:29 6 IBM number -- or you still have both. You have both  
01:29 7 your IBM number and then a corresponding ID number?

01:29 8 A. Right. So mine lines up with my IBM.  
01:29 9 Theirs does not. So it's very confusing to try to  
01:29 10 look up stuff under that because those last four  
01:29 11 digits don't correspond to whatever his IBM number is.

01:29 12 Q. Okay. So do you know what IBM number is  
01:29 13 used for versus what an ID number like this is used  
01:29 14 or --

01:29 15 MS. JONES: Objection.

01:30 16 Q. -- other than body-worn cameras?

01:30 17 A. Again, searching for reports in our  
01:30 18 reporting system. I would have to look it up under  
01:30 19 that 817 number for him. Or for those officers.

01:30 20 Q. Okay. So searching for written reports  
01:30 21 you use the ID number?

01:30 22 A. Yes. For the newer officers.

01:30 23 Q. Okay. And for you, for example, what  
01:30 24 would you use?

01:30 25 A. In our reporting system search?



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